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Counsel for Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	
RINCON ISLAND LIMITED PARTNERSHIP	§	CASE NO.16-33174
	§	
	§	
DEBTOR.	§	CHAPTER 11

MOTION TO CONVERT CHAPTER 11 CASE TO CHAPTER 7

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Jason R. Searcy, Trustee, (the “Trustee” and/or “Movant”), in the above-styled and numbered cause, and files this his *Motion to Convert Chapter 11 Case to Chapter 7* (the “Motion”), and in support thereof, respectfully represents as follows:

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING, SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT WITHIN TWENTY-FOUR (24) DAYS FROM THE DATE YOU WERE SERVED WITH IS PLEADING. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

I.

1.1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. § 1334. Consideration of this Motion is a core proceeding pursuant to 28 U.S.C. § 157(b). The relief requested is sought pursuant to 11 U.S.C. § 1112(a) and Fed. and Fed. R. Bankr. P. 1017.

1.2. On August 8, 2016 (the “Petition Date”), the Debtor filed its voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code, thereby initiating the Bankruptcy Case and creating the respective bankruptcy estate (the “Estate”).

1.3. On June 29, 1017, Jason R. Searcy was appointed to serve as the Chapter 11 Trustee. Jason R. Searcy is the duly appointed and serving Chapter 11 Bankruptcy Trustee for the above-named Debtors.

II.

2.1. Trustee believes that there is no viable avenue for reorganization by the Debtor’s estate. The oil and gas leases constituting the primary assets of the Debtor have been conveyed with approval of the court to the California State Lands Commission. A motion to abandon the remaining real property interests and interests in equipment has been filed. Cause therefore exists for conversion of this case, and Trustee contends that conversion is in the best interests of creditors of the estates.

2.2. Trustee therefore requests that each of this case be converted to a case under Chapter 7 in accordance with 11 U.S.C. § 1112(a).

WHEREFORE PREMISES CONSIDERED, Trustee prays for an Order of this Court converting this case into a case under Chapter 7 of the bankruptcy code, and for such other and further relief to which he may be entitled.

SIGNED December 12, 2017.

Respectfully submitted,
SEARCY & SEARCY, P.C.

/S/ Jason R. Searcy
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CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the above and foregoing was served by electronic notice on all persons requesting notice under the ECF filing system for the Northern District of Texas, and by U. S. Mail, postage paid, to each interested party on the attached service list by the service agent, Certificateofservice.com, on or before the 13th day of December 2017.

/S/ Jason R. Searcy
JASON R. SEARCY